UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

)		
UNITED STATES OF AMERICA)		
)		
V.)	Crim. No	. 15-cr-10271-WGY
)		
ALEX LEVIN)		
)		

DEFENDANT'S MOTION FOR PERMISSION TO TRAVEL

The defendant, Alex Levin, moves that this Court permit him to travel to Houston, Texas from October 10, 2018 to October 15, 2018. Mr. Levin's pretrial conditions of release restrict his ability to travel beyond the New England states without Court permission.

Mr. Levin has abided by his pretrial conditions of release at all times since being released in April of 2016. In July of 2018, the Court allowed a motion broadening Mr. Levin's geographic travel restrictions to include the greater New England area, specifically to those states that border Massachusetts: New Hampshire, Connecticut, New York, and Rhode Island. Additionally, the Court removed a previously imposed curfew in order to allow Mr. Levin greater flexibility with this work schedule. Mr. Levin is still required to notify and seek approval from Probation and Pretrial Services in advance of any travel plans. Probation, through the assigned probation officer

Jessica Tarkenton, informed Mr. Levin that the Court would have to approve any travel beyond these states.

Mr. Levin hopes to travel to Houston in order to spend time with his fiancé and their close friends who live in Texas. He has not left the greater New England area since he was released from custody over two years ago. Were the Court to allow this request, Mr. Levin would depart from Boston on October 10, 2018 and return shortly after midnight on October 15, 2018. Mr. Levin's steadfast adherence to the Court's orders during his release indicates that allowing him to travel to Houston for a brief period is warranted.

WHEREFORE, the defendant moves that this Court allow this motion and allow him to travel to Houston, TX from October 10, 2018 to October 15, 2018.

ALEX LEVIN
By His Attorneys,
CARNEY & ASSOCIATES

J. W. Carney, Jr.
J. W. Carney, Jr.
B.B.O. # 074760

Daniel J. Gaudet B.B.O. # 688120

Carney & Associates 20 Park Plaza, Suite 1405 Boston, MA 02116 617-933-0350 jcarney@CARNEYdefense.com

September 7, 2018

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on or before the above date.

J. W. Carney, Jr.

J. W. Carney, Jr.